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JUL 30 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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FILE NO: 46001.000278

July 30, 2001

**By Hand**

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: *WorldCom, Cox, and AT&T ads. Verizon***  
**CC Docket Nos. 00-218, 00-249, and 00-251**

Dear Ms. Salas:

Enclosed for filing on behalf of Verizon, please find four copies of Verizon's Objections to AT&T and Worldcom's Second Set of Data Requests.

Please do not hesitate to call me with any questions.

Very truly yours,

*Kimberly Newman/lwc*

Kimberly A. Newman

cc: Dorothy T. Attwood (8 copies)(by hand)  
David Levy, Esq.  
Mark A. Keffer, Esq.  
Jodie L. Kelley, Esq.  
Allen Feifeld, Esq.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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**JUL 30 2001**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	
	)	
In the Matter of	)	
Petition of Cox Virginia Telecom, Inc.	)	
Pursuant to Section 252(e)(5) of the	)	
Communications Act for Preemption	)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
Virginia Inc. and for Arbitration	)	
	)	
In the Matter of	)	
Petition of AT&T Communications of	)	
Virginia Inc., Pursuant to Section 252(e)(5)	)	CC Docket No. 00-251
of the Communications Act for Preemption	)	
of the Jurisdiction of the Virginia	)	
Corporation Commission Regarding	)	
Interconnection Disputes With Verizon	)	
Virginia Inc.	)	

**VERIZON VIRGINIA INC.'S OBJECTIONS  
TO AT&T AND WORLDCOM'S SECOND SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Second Set of Data Requests served on Verizon jointly by AT&T and WordCom on July 25, 2001.

## **GENERAL OBJECTIONS**

1. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad, unduly burdensome or vague.

5. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

6. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

7. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. See, e.g., Memorandum Opinion and Order, In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996, CC Docket No. 00-251 (January 26, 2001).

8. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T, WorldCom or any other entity.

9. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T or WorldCom.

## **SPECIFIC OBJECTIONS**

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to AT&T and WorldCom's Data Requests as follows:

ITEM:                      Please provide year-to-date 2001 additions and retirements for each  
AT&T/WCOM 2-1        account and subaccount (e.g.-metallic and non-metallic) and in total  
                                 pursuant to FCC books.

REPLY:                    See General Objections.

VZ VA #291

ITEM:  
AT&T/WCOM 2-2

For each year, 1990 through 2000, please provide for each account and subaccount (e.g. – metallic and non-metallic) and in total the following data for Virginia pursuant to FCC books:

- a. Beginning-of-year plant in service and depreciation reserve balance
- b. End-of-year plant in service and depreciation reserve balance
- c. Plant additions
- d. Plant retirements
- e. Depreciation accruals
- f. Transfers and adjustments.

REPLY: See General Objections.

VZ VA #292

ITEM:  
AT&T/WCOM 2-3

Please provide data in Request 1 pursuant to intrastate books, if different.

REPLY:

See General Objections.

VZ VA #293

ITEM: Please provide current planning forecast for data in Request 1 for years  
AT&T/WCOM 2-4 2001 forward.

REPLY: See General Objections.

VZ VA #294



ITEM:  
AT&T/WCOM 2-5

Please provide current planning forecast for provision of cable television services in Virginia, and identify technology (i.e. – DSL, Fiber/Coax, Wireless).

REPLY:

See General Objections.

VZ VA #295

ITEM: Please provide current planning forecast for provision of DSL services in  
AT&T/WCOM 2-6 Virginia.

REPLY: See General Objections.

VZ VA #296

ITEM:  
AT&T/WCOM 2-7

Please provide copy of latest earnings or surveillance report filed with  
Virginia State Corporation Commission.

REPLY:

See General Objections.

VZ VA #297

ITEM:  
AT&T/WCOM 2-8

Please provide list of projection lives and future net salvage percents as currently prescribed by the Virginia State Corporation Commission, and relevant documentation (i.e. – Commission Order, correspondence, etc.)

REPLY:

See General Objections.

VZ VA #298

ITEM:  
AT&T/WCOM 2-9

Please provide current planning forecast for ATM switch deployment.

REPLY:

See General Objections.

VZ VA #299

ITEM: Please identify whether the Company's ATM deployment will be as an  
AT&T/WCOM 2-10 "overlay" network, or will replace digital switches.

REPLY: See General Objections.

VZ VA #300

ITEM:  
AT&T/WCOM 2-11

If the company anticipates that the deployment of ATM switching will displace any of its existing switches, please identify those switching locations which will be displaced and their anticipated replacement date.

REPLY:

See General Objections.

VZ VA #301

ITEM:  
AT&T/WCOM 2-12

Please provide current planning forecast for SONET deployment.

REPLY:

See General Objections.

VZ VA # 302



ITEM:  
AT&T/WCOM 2-13

Please provide current planning forecast for fiber in the distribution network.

REPLY:

See General Objections.

VZ VA #303

ITEM: Please provide actual deployment data for ATM, SONET and fiber in  
AT&T/WCOM 2-14 distribution network.

REPLY: See General Objections.

VZ VA #304

ITEM:  
AT&T/WCOM 2-15

Please provide copies of 1990-2000 ARMIS 43-07 reports for Virginia.

REPLY:

See General Objections.

VZ VA #305

ITEM:  
AT&T/WCOM 2-16

Please provide a copy of latest "Average Life Indications Based on Full Mortality Study" for each account.

REPLY:

See General Objections.

VZ VA #306

ITEM:  
AT&T/WCOM 2-17

In addition to what is specified in question one, please provide year-to-date 2001 additions and retirements for each account and subaccount (e.g.-metallic and non-metallic) and in total pursuant to FCC books.

REPLY:

See General Objections.

VZ VA #307

Respectfully submitted,

Karen Zacharia / *by permission*  
*wc*

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Dated: July 30, 2001

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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's and WorlCom's Second Set of Data Requests were served in the manner indicated this 30<sup>th</sup> day of July, 2001 on:

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Constance Corry